



GLOBALSTAR LLC
461 SO. MILPITAS BLVD.
MILPITAS, CA 95035

Tel: (408) 933-4525
Fax: (408) 933-4960
www.globalstar.com

Anthony J. Navarra
President

December 2, 2005

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: IB Docket Nos. 05-220 and 05-221

Dear Chairman Martin:

I am writing to respond to recent press reports and *ex parte* submissions in the above-referenced proceedings, in which the Commission has sought comment about the most appropriate use of 40 MHz of currently unassigned Mobile Satellite Service ("MSS") spectrum in the 2 GHz band, a portion of which was originally assigned to Globalstar in July 2001. As discussed below, Globalstar strongly opposes any proposals that could result in the assignment of this spectrum to the two existing 2 GHz MSS licensees, both of which are several years from beginning any actual operations, or reallocation of the spectrum to the terrestrial wireless industry, which already has access to more than enough spectrum to meet its long-term needs. Instead, we urge the Commission to restore to Globalstar the spectrum originally assigned to it, to ensure that Globalstar has sufficient spectrum to expand the valuable MSS services that it has been providing for the past six years to public safety and other critical first responder customers throughout the United States and the World.

Globalstar is providing MSS voice and data services here and now to approximately 183,000 customers. Its services are growing rapidly, with typically a 50 percent annual increase in subscribers. The company is building additional U.S. gateway earth stations in both Florida and Alaska, to expand its service capacity in those areas; and it is deploying innovative new products and services — including a variety of broadband data applications — to meet the demands of its growing customer base. Globalstar is thus a vital player in the U.S. MSS market, and is the only U.S. licensed MSS provider that stands ready and financially able to build, launch, and operate a MSS system in the 2 GHz spectrum.

The value of these services was proved in the recent Gulf Coast disasters. As you know, Hurricanes Katrina and Rita disabled the wireline and terrestrial wireless telecommunications infrastructures along the Gulf Coast and surrounding area. Even today, in many areas affected by those storms, terrestrial telecommunications networks remain in disarray. In contrast, by virtue of its reliance on satellites located hundreds of miles above the earth's surface, Globalstar's MSS system was unaffected by Hurricanes Katrina and Rita, and Globalstar's satellite phone service continued uninterrupted in the Gulf of Mexico and Southeastern U.S., including Louisiana, Mississippi, Alabama, and Missouri after those storms. Indeed, within days after Hurricane Katrina made landfall, Globalstar was able to airlift nearly 10,000 handsets to state and federal officials in the affected region who lacked any other effective communications capabilities, and Globalstar has been providing vital communications services to FEMA and other state and local disaster relief and first responder agencies in the areas affected by the storms ever since.

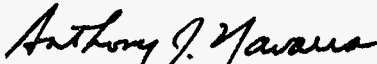
It is critical that Globalstar have enough spectrum to expand these services to meet the growing needs of first responders and other customers. The 2 GHz spectrum band is the only available MSS expansion spectrum, and is ideally suited for that purpose. Accordingly, it is important that the Commission not proceed with its proposal to reserve more of the unassigned spectrum to two foreign-licensed companies — ICO Satellite Services (which is licensed by the United Kingdom) and TMI Communications and Company Limited Partnership (which is licensed by Canada) — that already have enough MSS spectrum in the 2 GHz band.

It is equally important that the Commission not reallocate the spectrum for terrestrial wireless services. Terrestrial providers already have access to more than 200 MHz of spectrum for their current use, and will soon have access to an additional 175 MHz of spectrum to meet their future spectrum needs.

Recent proposals to initiate a rulemaking proceeding to consider from scratch the best use for this spectrum are unnecessary and would simply delay its use. The Commission has very recently reviewed the amount of spectrum allocated to MSS and reallocated 30 MHz of the original 70 MHz of MSS spectrum to terrestrial uses. There is no cause to consider further reallocations, when Globalstar and others are ready, willing, and able to use the 2 GHz spectrum to expand or initiate their extremely valuable services. The self-serving rulemaking proposals would not advance the public interest. Rather, they would only put many interested parties to unnecessary expense relitigating issues that were only recently thoroughly aired and reasonably decided.

In short, the proposals to give additional 2 GHz spectrum to two entities that already have spectrum in that band that they are not using, or to transfer the spectrum to terrestrial use, are both misguided. Globalstar urges the Commission not to go forward with either proposal. It should instead reinstate Globalstar's 2 GHz MSS authorization and assign a portion of the unassigned spectrum to Globalstar. Doing so will ensure that Globalstar will be able to continue to expand and enhance its valuable MSS service offerings and meet the needs of its growing customer base.

Sincerely yours,


Anthony J. Navarra
President-Global Operations

cc: Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein